

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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ROSE HANSEN, individually and on Behalf of all  
others similarly situated,

Plaintiff,

vs.

WACHOVIA CORPORATION, ET AL.,

Defendants.

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Civil Action No.: 1:08-cv-5320-NRB

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TODD A. WRIGHT, Individually and on behalf of  
all others similarly situated,

Plaintiff,

vs.

WACHOVIA CORPORATION, ET AL.,

Defendants.

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Civil Action No.: 1:08-cv-5324-DC

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DENISE A. TUTTLE, individually and on behalf of  
all others similarly situated,

Plaintiff,

vs.

WACHOVIA CORPORATION, ET AL.,

Defendants.

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Civil Action No.: 1:08-cv-5578-DC

ROBERT M. COMINSKY, Individually and on behalf of The Wachovia Savings Plan and all others similarly situated,

Civil Action No.: 1:08-cv-5990-UA

Plaintiff,

vs.

WACHOVIA CORPORATION, ET AL.,

Defendants.

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JASON T. WILLARD, On Behalf of Himself And All Others Similarly Situated,

Civil Action No.: 1:08-cv-6196-UA

Plaintiff,

vs.

WACHOVIA CORPORATION, ET AL.,

Defendants.

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MICHAEL WELCH, Individually And On Behalf of All Others Similarly Situated,

Civil Action No.: 1:08-cv-6464

Plaintiff,

vs.

WACHOVIA CORPORATION, ET AL.,

Defendants.

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**DECLARATION OF JEFFREY M. NORTON IN SUPPORT  
OF PLAINTIFF'S MOTION FOR ENTRY OF PROPOSED  
ORDER CONSOLIDATING THE ERISA ACTIONS  
AND APPOINTING INTERIM LEAD COUNSEL**

I, Jeffrey M. Norton, declare the following under penalty of perjury:

1. I am a partner in the law firm of Harwood Feffer LLP and one of the attorneys of record for plaintiff Michael Welch (“Plaintiff”) and the proposed class members in the above-captioned action *Welch v. Wachovia Corporation, et al.*, Civil Action No.: 1:08-cv-6464.

2. I submit this declaration in further support of Plaintiff’s motion for consolidation of the above-captioned ERISA actions under the caption *In re Wachovia Corporation ERISA Litigation*, Master File No. 1:08-cv-532 (NRB) (the “Consolidated Action”) and for appointment of Harwood Feffer LLP as Interim Lead Counsel for the plaintiffs in the Consolidated Action.

3. Annexed hereto as Exhibit A is a true and accurate copy of Harwood Feffer LLP’s firm resume.

Dated: July 24, 2008

s/ Jeffrey M. Norton  
Jeffrey M. Norton (JN-4827)  
Harwood Feffer LLP  
488 Madison Avenue, 8th Floor  
New York, New York 10022  
Tel: (212) 935-7400  
Fax: (212) 753-3630